



June 15, 2005

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OFFICE OF GENERAL
COUNSEL
2005 JUN 20 P 1:44

Via Fax and First Class Mail
Ms. Alva DeJarnett-Miller
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 5612

Dear Ms. DeJarnett-Miller:

I am an Associate General Counsel of the Service Employees International Union ("SEIU") and counsel to SEIU's separate non-federal political fund, the SEIU International Political Education & Action Fund ("IPEA"). As I explained during our telephone conversation yesterday, on May 26, 2005, IPEA received a letter from the Commission transmitting an affidavit from Stefan Gleason with attachments and a cover letter from his counsel. This is the first correspondence that IPEA has received regarding the above referenced MUR. SEIU, a respondent in this MUR, received the same affidavit and attachment, along with a very similar letter from the Commission also on May 26. The letter to IPEA was incorrectly filed with the letter of the same date to SEIU. This error was not discovered until yesterday.

When I was shown a copy of the letter yesterday afternoon by one of our staff, I realized that the letter was directed to IPEA and that the Commission was giving IPEA an opportunity to respond to the 'indication' in the Gleason affidavit that IPEA "may have violated the Federal Election Campaign Act". However, because of our filing error, the time for submitting that response has passed.

When we spoke yesterday, I requested an extension of time to and including Tuesday, June 21, 2005 in which to file a response on behalf of IPEA. You indicated that this would be ok and that I should put my request in writing and fax it to your office along with IPEA's designation of counsel. I stated that I would do so this morning after I had an opportunity to confer with one of my co-counsel who was retuning to his office from an out of town trip today.

SERVICE EMPLOYEES
INTERNATIONAL UNION
AFL-CIO, CLC

1313 L Street, NW
Washington, DC 20005

202 898 3200
TDD 202 898 3481
www.SEIU.org

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We respectfully submit that this short extension of time will not prejudice the rights of any party or delay the resolution of this matter. As a final note I would like to point out that Liz Gustafson is not the Treasurer of the IPEA. As reflected in the IPEA Statement of Organization, IRS Form 8871, Anna Burger is the IPEA Treasurer. Please make this change in your records.

Very truly yours,

John J. Sullivan
Associate General Counsel

ANDREW L. STERN
International President

ANNA BURGER
International Secretary-Treasurer

ELISEO MEDINA
Executive Vice President

TOM WOODRUFF
Executive Vice President

MARY KAY HENRY
Executive Vice President

GERRY HUDSON
Executive Vice President

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FEDERAL ELECTION COMMISSION
Office of General Counsel
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Witness
FAX (202) 219-3923

MUR: 5612

COUNSEL: John J. Sullivan

FIRM: Service Employees International Union

ADDRESS: 1313 L Street, N.W., Washington, DC 20005

TELEPHONE - OFFICE: (202) 898-3465

FAX: (202) 898-3323

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/15/05
Date

[Signature]
Signature

Assoc. General Counsel
Title

RESPONDENT/WITNESS NAME (PRINT): _____

MAILING ADDRESS: _____

TELEPHONE - HOME: () _____

OFFICE: () _____

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

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FEDERAL ELECTION COMMISSION

Office of General Counsel

999 E Street, NW

Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each Respondent/Witness

FAX (202) 219-3923

MUR: 5612

COUNSEL: Robert Weinberg

FIRM: Bredhoff & Kaiser

ADDRESS: 805 15th Street, N.W. Suite 1000, Washington, DC 20005

TELEPHONE - OFFICE: (202) 842-2600

FAX: (202) 842-1888

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/15/05
Date

[Signature]
Signature

Assoc. General Counsel
Title

RESPONDENT/WITNESS NAME (PRINT): _____

MAILING ADDRESS: _____

TELEPHONE - HOME: () _____

OFFICE: () _____

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999 E Street, NW

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STATEMENT OF DESIGNATION OF COUNSEL
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FAX (202) 219-3923

MUR: 5612

COUNSEL: Michael B. Trister

FIRM: Lichtman, Trister, Singer & Ross

ADDRESS: 1666 Connecticut Avenue, Suite 500, Washington, DC 20009

TELEPHONE - OFFICE: (202) 328-1666

FAX: (202) 328-9162

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/15/05
Date

[Signature]
Signature

Assoc. Counsel General
Title

RESPONDENT/WITNESS NAME (PRINT): _____

MAILING ADDRESS: _____

TELEPHONE - HOME: () _____

OFFICE: () _____

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